

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ANNE SQUADRON, ANNE STRICKLAND  
SQUADRON, SETH SQUADRON, ELIZABETH  
SQUADRON, DANIEL SQUADRON, WILLIAM  
SQUADRON, DEBRA LAGAPA, RICHARD  
SQUADRON, THEODOSIA PRICE, DIANE  
SQUADRON, THOMAS SHEA, PETER GOLD,  
CAROL GOLD, SARAH D. GOLD, SWING  
HARRE, DAVID HARRE, VANESSA N. GANG,  
ANNA ROTHWELL, ROBERT VAS DIAS and  
MARGARET BUTCHER,

Defendants.

Adv. Pro. No. 10-05164 (SMB)

**STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION**

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including January 31, 2016.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: New York, New York  
January 4, 2016

By: /s/ Howard L. Simon  
Howard L. Simon (hsimon@windelsmarx.com)  
Kim M. Longo (klongo@windelsmarx.com)  
John J. Tepedino (jtepedino@windelsmarx.com)  
Windels Marx Lane & Mittendorf LLP  
156 West 56th Street  
New York, New York 10019  
Tel: (212) 237-1000  
Fax: (212) 262-1215

*Special Counsel to Irving H. Picard, Trustee for  
the SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L.  
Madoff*

Dated: New York, New York  
January 4, 2016

By: /s/ Brian J. Neville  
Barry R. Lax (blax@laxneville.com)  
Brian J. Neville (bneville@laxneville.com)  
Raquel Kraus (rkraus@laxneville.com)  
Lax & Neville, LLP  
1450 Broadway, 35th Floor  
New York, New York 10018  
Telephone: (212) 696-1999  
Facsimile: (212) 566-4531

*Attorneys for Defendants*